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Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Dedicated Short Range Communications Service in the 5.850-5.925 GHz Band

Dear Ms. Dortch:

On behalf of General Motors Company (GM), this ex parte notice memorializes a meeting between representatives of GM, Chairman Pai and his staff. On Friday, March 17, 2017, John Capp, Director of Global Safety Strategy & Vehicle Programs, Scott Geisler, VPO - Driver Distraction, Crash Avoidance/Driver Perf/Automated Vehicle, Paul Hemmersbaugh, Chief Counsel & Policy Director, Jeff Stefan, Counsel, Autonomous Vehicles, Vijay Iyer, Director Communications, Jeff Massimilla, Chief Product Cybersecurity Officer, Global Product Integrity, Chris Murphy, Lead Counsel & Chief Privacy Officer, Commercial, Product Safety and Regulatory, Andy York, Executive Director, Federal Affairs, GMNA Public Policy, and Rich Lopez, Director Federal and Administration Affairs, met with Chairman Ajit Pai and Nick Degani, Senior Counsel of the office of Chairman Pai. The purpose of the meeting was to update the Chairman on GM's latest efforts with the development, testing and deployment of Dedicated Short Range Communications (DSRC) for vehicle to vehicle (V2V) and vehicle to infrastructure (V2I) communications.

Mr. Capp opened up the discussion by providing an overview of V2V and V2I and how there is no other technology in the market place today that can provide such large scale safety and traffic mitigation benefits. He explained that the reason why this technology has taken time to develop is because it is complex and proper testing was needed prior to deployment.

He discussed the importance of ensuring that DSRC services are free from harmful interference and that the deployment of unlicensed Wi-Fi in the 5.850 – 5.925 GHz (5.9 GHz) band could be very damaging to the technology's deployment and success. He explained that GM understands the need for spectrum and if there is a way to share the 5.9 GHz band then GM is open to that concept but only under the condition that there is no harmful interference to the DSRC systems.



Mr. Capp went on to discuss GM's deployment of the DSRC equipped 2017 Cadillac CTS vehicles that are on roads today. He explained that while GM is leading the industry with the deployment of the CTS, this technology is no different than others in the fact that in order to further develop the safety benefits more testing must be done.

Mr. Capp explained why GM supports the release of the National Highway Traffic Safety Administration's (NHTSA) Notice of Proposed Rulemaking (NPRM). Mr. Capp explained that the industry needs the standards to be in place in order to have full deployment. He explained that for the system to be interoperable then it has to be developed and deployed correctly. He let the Chairman and Mr. Degani know that GM is working on comments for the NPRM and that while some clarification is needed, GM is happy with its progress.

Mr. Capp and Mr. Geisler discussed the additional testing that is taking place at the Crash Avoidance Metrics Partnership (CAMP) that is comprised of many of the world's largest automakers including GM. They explained how CAMP, through the Ann Arbor pilot program, developed the basic safety message and is now tasked with the development of the Security Credential Management System (SCMS). They explained that the SCMS is very complex and will take time to develop.

In response to questions asked by the Chairman and Mr. Degani, Mr. Capp and Mr. Geisler discussed the testing that has occurred with both the re-channelization and detect and avoid proposals. They explained that due to the low latency of DSRC they have incurred up to a 90% error rate with cross channel interference. They also explained that if the re-channelization proposal were to be chosen there would need to be changes in both the software and hardware of the DSRC system which would cause timely delays. Mr. Capp and Mr. Geisler let the Chairman and Mr. Degani know that additional testing will be done and GM will provide them an update.

When asked why GM moved forward with the deployment of the technology in the Cadillac CTS, Mr. Capp explained that the system was ready and that only through deployment could GM's engineers gain additional data to make the system better.

The Chairman asked Mr. Capp and Mr. Geisler if the other automakers are on the same aggressive timeline. They let him know that, while GM is ahead of others, GM believes that others, too, are also working on deployment, but uncertainty in the spectrum and the rule may impact timing.

Mr. Massimilla and Mr. Murphy provided a brief overview of the cybersecurity and privacy protections that GM has in place through GM's cyber and privacy by design policy.

Mr. Hemmersbaugh stated that out of all the pending rules currently at NHTSA, the V2V rule would save more lives than all the other rules combined.



This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.
Should you have any questions please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to be "A. York", written over the word "Sincerely,".

Andrew York
Executive Director, Federal Affairs